

Monte J. White & Associates, P.C.  
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IN THE UNITED STATE BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

IN RE:	§	CASE NO.09-70480-HDH
Jeremy David McClelland	§	
and	§	CHAPTER 13
Katherine Ann McClelland	§	
Debtor(s)	§	
	§	

MOTION TO WAIVE WAGE DIRECTIVE

NOW COMES, Jeremy David McClelland and Katherine Ann McClelland, in the above-styled and numbered cause, and file this Motion to Waive Wage Directive on behalf of Debtor(s), and in support thereof would respectfully show unto the Court as follows:

1. Debtor(s) filed a Chapter 13 Bankruptcy on 9/22/2009.
2. Debtor(s) are asking the Court to waive the requirement of payroll deduction for their Chapter 13 payment. Debtor, Jeremy McClelland is self-employed and joint debtor, Katherine McClelland does not work.

WHEREFORE, Debtor(s) Jeremy David McClelland and Katherine Ann McClelland, pray that the Motion to Waive Wage Directive filed on Behalf of Debtor(s) be granted and for such other and further relief to which said Debtor(s) may be entitled, either at law or in equity.

Respectfully submitted,

/s/Monte J. White, SBN 00785232  
Attorney for debtor(s)

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on 10/30/2009 the office of the Chapter 13 Trustee was contacted and this office was advised that the Trustee

- ☒ does not oppose the motion
- ☐ opposes the motion

s/Monte J. White  
Attorney for Debtor

CERTIFICATE OF SERVICE

I, Monte J. White, do hereby certify that I served a true and correct copy of the foregoing Motion to the parties listed on the following parties by ECF and/or regular mail on November 3, 2009.

CHAPTER 13 TRUSTEE

Walter O'Cheskey  
6308 Iola Ave  
Lubbock, TX 79424

U.S. TRUSTEE

William T. Neary  
1100 Commerce St., Rm 9SC60  
Dallas, TX 75242

DEBTORS

Jeremy David McClelland  
Katherine Ann McClelland  
5496 FM 1883  
Henrietta, TX 76365

s/Monte J. White  
Attorney for Debtor